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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

CHRISTINE PADILLA, an individual, on behalf
of herself and all others similarly situated,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA

Defendants.

Lead Case No.: 4:25-cv-03209-YGR

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE CONSOLIDATION OF
ACTIONS AND SETTING PROCESS FOR
APPOINTMENT OF INTERIM CLASS
COUNSEL**

Additional Captions Continue on Next Page

1 ANA MARAVILLA on behalf of herself and all
2 others similarly situated,

3 Plaintiff,

4 v.

5 CALIFORNIA PHYSICIANS' SERVICE D/B/A
6 BLUE SHIELD OF CALIFORNIA,

7 Defendant.

Case No.: 4:25-cv-03213-YGR

8 JASTON ARCHIE on behalf of himself and all
9 others similarly situated,

10 Plaintiff,

11 v.

12 CALIFORNIA PHYSICIANS' SERVICE D/B/A
13 BLUE SHIELD OF CALIFORNIA,

14 Defendant.

Case No.: 4:25-cv-03222-YGR

15
16 W. on behalf of himself and all others similarly
17 situated,

18 Plaintiff,

19 v.

20 CALIFORNIA PHYSICIANS' SERVICE d/b/a
21 BLUE SHIELD OF CALIFORNIA,

22 Defendant.

Case No.: 4:25-cv-03225-YGR

1 ELLEN RENTAS TORRES, individually and on
2 behalf of herself and all others similarly situated,

3 Plaintiff,

4 v.

5 CALIFORNIA PHYSICIANS' SERVICE D/B/A
6 BLUE SHIELD OF CALIFORNIA,

7 Defendant.

Case No.: 4:25-cv-03228-YGR

8 ASHLEY JOHNSON on behalf of herself and all
9 others similarly situated,

10 Plaintiff,

11 v.

12 CALIFORNIA PHYSICIANS' SERVICE
13 D/B/A BLUE SHIELD OF CALIFORNIA,

14 Defendant.

Case No.: 4:25-cv-03234-YGR

15
16 ETHAN HECK on behalf of herself and all others
17 similarly situated,

18 Plaintiff,

19 v.

20 CALIFORNIA PHYSICIANS' SERVICE D/B/A
21 BLUE SHIELD OF CALIFORNIA,

22 Defendant.

Case No.: 4:25-cv-03300-YGR

DIANE LAMARRE on behalf of herself and all
others similarly situated,

Plaintiff,

v.

CALIFORNIA PHYSICIANS' SERVICE D/B/A
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No.: 4:25-cv-03301-YGR

KENDRA BAGE on behalf of herself and all
others similarly situated,

Plaintiff,

v.

CALIFORNIA PHYSICIANS' SERVICE D/B/A
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No.: 4:25-cv-03304-YGR

SUSAN REIMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-03347-YGR

1 JOHN AIELLO, on behalf of himself and all
2 others similarly situated,

3 Plaintiff,

4 v.

5 CALIFORNIA PHYSICIANS' SERVICE d/b/a
6 BLUE SHIELD OF CALIFORNIA,

7 Defendant.

Case No. 4:25-cv-03386-YGR

8 BELINDA FOLEY, individually and on behalf of
9 class of similarly situated individuals,

10 Plaintiff,

11 v.

12 CALIFORNIA PHYSICIANS' SERVICE d/b/a
13 BLUE SHIELD OF CALIFORNIA,

14 Defendant.

Case No. 4:25-cv-03394-YGR

15 LISA REINGOLD, individually and on behalf of
16 all others similarly situated,

17 Plaintiff,

18 v.

19 CALIFORNIA PHYSICIANS' SERVICE d/b/a
20 BLUE SHIELD OF CALIFORNIA,

21 Defendant.

Case No. 4:25-cv-3442-YGR

AUSTIN KAHN, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-03523-YGR

DEANNA SMITH, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

BLUE SHIELD OF CALIFORNIA LIFE AND
HEALTH INSURANCE COMPANY d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-03712-YGR

JERRY JONES, ARTURO GARCIA, and
RONALD WEIS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-03743-YGR

JOHN DOE I and JANE DOE I,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-03925-YGR

CHARLENE RAMIREZ, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE d/b/a
BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-04165-YGR

J.T. AND E.H., individually and on behalf of a
class of similarly situated individuals,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE, doing
business as, BLUE SHIELD OF CALIFORNIA,

Defendant.

Case No. 4:25-cv-04343-YGR

WHEREAS, there are nineteen proposed class actions pending in this Court, which allege that Defendant California Physicians' Service d/b/a Blue Shield Of California ("Defendant") violated state and federal law by using tools¹ to allegedly and without authorization disclose Plaintiffs' and class members' personally identifiable information and protected health information to third parties, who allegedly intercepted, viewed, and monetized such information:

- *Padilla v. California Physicians' Service*, Case No. 4:25-cv-03209 (N.D. Cal.), filed on April 9, 2025 ("Padilla");
- *Maravilla v. California Physicians Service*, Case No. 3:25-cv-03213 (N.D. Cal.), filed on April 10, 2025 ("Maravilla");
- *Archie v. California Physicians' Service*, Case No. 4:25-cv-03222 (N.D. Cal.), filed on April 10, 2025 ("Archie");
- *W. v. California Physicians' Service*, Case No. 3:25-cv-03225 (N.D. Cal.), filed on April 10, 2025 ("Y.W.");
- *Torres v. California Physicians' Service*, Case No. 3:25-cv-03228 (N.D. Cal.), filed on April 10, 2025 ("Torres");
- *Johnson v. California Physicians' Service*, Case No. 4:25-cv-03234 (N.D. Cal.), filed on April 10, 2025 ("Johnson");
- *Heck v. California Physicians' Service*, Case No. 3:25-cv-03300 (N.D. Cal.), filed on April 11, 2025 ("Heck");
- *LaMarre v. California Physicians' Service*, Case No. 4:25-cv-03301 (N.D. Cal.), filed on April 11, 2025 ("LaMarre");
- *Bage v. California Physicians' Service*, Case No. 3:25-cv-03304 (N.D. Cal.), filed on April 11, 2025 ("Bage");
- *Reiman v. California Physicians' Service*, Case No. 4:25-cv-03347 (N.D. Cal.), filed on April 15, 2025 ("Reiman");

¹ Plaintiffs allege the tools are tracking technologies; Defendant contends the tools are analytics technologies.

- 1 • *Aiello v. California Physicians' Service*, Case No. 4:25-cv-03386 (N.D. Cal.), filed on
- 2 April 16, 2025 (“*Aiello*”);
- 3 • *Foley v. California Physicians' Service*, Case No. 4:25-cv-03394 (N.D. Cal.), filed on
- 4 April 16, 2025 (“*Foley*”);
- 5 • *Reingold v. California Physicians' Service*, Case No. 4:25-cv-3442 (N.D. Cal.), filed on
- 6 April 18, 2025 (“*Reingold*”);
- 7 • *Kahn v. California Physicians' Service*, Case No. 4:25-cv-03523 (N.D. Cal.), filed on
- 8 April 22, 2025 (“*Kahn*”);
- 9 • *Smith v. Blue Shield of California Life & Health Insurance Company*, Case No. 4:25-cv-
- 10 3712 (N.D. Cal.), filed on April 29, 2025 (“*Smith*”);
- 11 • *Jones et al. v. California Physicians' Service*, Case No. 4:25-cv-03743 (N.D. Cal.), filed
- 12 on April 29, 2025 (“*Jones*”);
- 13 • *Doe I et al. v. California Physicians' Service*, Case No. 4:25-cv-03925 (N.D. Cal.), filed
- 14 on May 5, 2025 (“*Does*”);
- 15 • *Ramirez v. California Physicians' Service*, Case No. 4:25-cv-04165 (N.D. Cal.) filed on
- 16 May 14, 2025 (“*Ramirez*”); and
- 17 • *J.T., et al. v. California Physicians' Service*, Case No. 4:25-cv-04343 (N.D. Cal.) filed on
- 18 May 21, 2025 (“*J.T.*”) (collectively, the “Related Cases”).

19 WHEREAS, Plaintiff Johnson filed a motion to relate the *Maravilla*, *Archie*, *W.*, *Torres*, *Johnson*,
 20 *Heck*, *LaMarre*, and *Bage* cases to the *Padilla* case on April 15, 2025 (*Padilla*, ECF 12²), and on April
 21 17, 2025 the Court entered an order finding that it was inclined to grant the motion but was waiting for
 22 Defendant to be served and provide its position (*Padilla*, ECF 13).

23 WHEREAS, on April 21, 2025, Plaintiff *Padilla* requested and Defendant provided a duly
 24 executed Federal Rule of Civil Procedure 4(d) Waiver of the Service of Summons in the *Padilla* case,
 25 resulting in Defendant’s current responsive pleading deadline in the case being June 20, 2025.

26
 27
 28 ² All references to ECF Numbers shall be in the *Padilla* case, unless otherwise noted.

1 WHEREAS, Plaintiff Johnson filed a supplemental motion to relate the *Reiman, Aiello, Foley,*
2 *Reingold, Kahn, Smith, and Jones* cases to the *Padilla* case on May 2, 2025 (ECF 16).

3 WHEREAS, Plaintiffs in the *Does* case filed a supplemental motion to relate their case to the
4 *Padilla* case on May 14, 2025 (ECF 21).

5 WHEREAS, Plaintiff Johnson filed a supplemental motion to relate the *Ramirez* case to the
6 *Padilla* case on May 20, 2025 (ECF 22).

7 WHEREAS, Plaintiff Johnson filed a supplemental motion to relate the *J.T.* case to the *Padilla*
8 case on May 27, 2025 (ECF 24).

9 WHEREAS, Judge Yvonne Gonzalez Rogers granted all of the above-referenced motions to
10 relate on May 28, 2025 (ECF 26 and Docket Text).

11 WHEREAS, as to the *Padilla, Maravilla, Archie, W., Torres, Johnson, Heck, LaMarre, and Bage*
12 cases (and, presumably as to the *Reiman, Aiello, Foley, Reingold, Kahn, Smith, Jones, Does, Ramirez,*
13 and *J.T.* cases) the Court further ordered that given the number of cases, the Parties shall meet and confer
14 to discuss whether a consolidated complaint will be filed and related coordination matters (ECF 13);

15 WHEREAS, plaintiffs in the Related Cases (“Plaintiffs”) and Defendant have conferred and agree
16 that consolidation is appropriate under Federal Rule of Civil Procedure 42(a) because Plaintiffs contend
17 the Related Cases involve common questions of law and fact; specifically, the cases name a common
18 defendant, arise from substantially similar factual allegations regarding Defendant’s use of technologies³
19 that Plaintiffs claim allow third parties to intercept patient communications and information, and bring
20 the same or similar causes of action for overlapping classes;

21 WHEREAS, by entering into the instant Joint Stipulation (“Stipulation”) Defendant does not
22 concede that Plaintiffs or any putative class(es) they purportedly seek to represent have or have stated
23 valid individual or class claims against Defendant; does not admit the truth of any material allegations
24 against Defendant; and does not waive any rights or defenses at law or in equity, including but not limited
25 to any challenges to the Court’s jurisdiction, venue, the sufficiency of any existing or future pleadings,
26 or the merits of Plaintiffs’ individual and/or putative class claims;

27
28 ³ Plaintiffs allege that Defendant used tracking technologies; Defendant contends the technologies are analytics technologies.

1 WHEREAS, by entering into the instant Stipulation, Defendant does not concede that any later-
2 filed case is related to or should be subject to consolidation with the Related Cases;

3 WHEREAS, Plaintiffs agree that a process for the appointment of interim class counsel under
4 Fed. R. Civ. P. 23(g)(3) will be beneficial to the effective prosecution of the class claims;

5 WHEREAS, Defendant agrees that consolidation is appropriate at this time, but reserves the right
6 to move for bifurcation of any Related Case(s) if and when circumstances warrant;

7 WHEREAS Defendant agrees that appointment of interim class counsel will be beneficial to the
8 efficient management of these matters, and thus does not oppose consolidation under Fed. R. Civ. P 42(a)
9 or the appointment of necessary and appropriate interim class counsel;

10 WHEREAS, Defendant takes no position on the designation of any specific counsel as interim
11 class counsel at this time, but reserves all rights pending receipt and consideration of any joint or
12 individual application(s) for consideration as interim class counsel;

13 WHEREAS, the Related Cases presently have varying court-imposed deadlines and/or deadlines
14 pursuant to the Federal Rules of Civil Procedure for Defendant's responses to the complaints and/or for
15 submitting a proposed Case Management Plan and Scheduling Order;

16 WHEREAS, maintaining these varying deadlines prior to consolidation would lead to
17 inefficiency, duplication of effort, and an unnecessary expenditure of resources;

18 WHEREAS, to conserve party resources and for efficiency, the parties agree to defer the above-
19 mentioned deadlines until after the filing of a consolidated complaint;

20 WHEREAS, the parties propose, subject to Court approval, that this action proceed on the
21 following schedule:

- 22 • Any of Plaintiffs' counsel may file an individual or joint application for consideration as
23 interim class counsel, as set forth in paragraph 7, below;
- 24 • Plaintiffs will file a consolidated complaint no later than forty-five (45) calendar days
25 following the appointment of interim class counsel; and
- 26 • Defendants will respond to the consolidated complaint within forty-five (45) calendar
27 days of its filing. If Defendant responds by way of motion(s), Plaintiffs will have forty
28

(40) calendar days to oppose the motion(s), and Defendants will have thirty (30) calendar days to reply.

NOW THEREFORE, the parties through their respective counsel and subject to the Court's approval STIPULATE and AGREE that:

1. The following actions pending in this District should be consolidated for all proceedings and purposes, pursuant to Federal Rule of Civil Procedure 42(a) (hereafter the "Consolidated Action"):

- *Padilla v. California Physicians' Service*, Case No. 4:25-cv-03209, Judge Yvonne Gonzalez Rogers (the first-filed "Lead Case");
- *Maravilla v. California Physicians Service*, Case No. 3:25-cv-03213, previously assigned to Judge Peter H. Kang;
- *Archie v. California Physicians' Service*, Case No. 4:25-cv-03222, previously assigned to Judge Donna M. Ryu;
- *W. v. California Physicians' Service*, Case No. 3:25-cv-03225, previously assigned to Judge Maxine M. Chesney;
- *Torres v. California Physicians' Service*, Case No. 3:25-cv-03228, previously assigned to Judge Rita F. Lin;
- *Johnson v. California Physicians' Service*, Case No. 4:25-cv-03234, previously assigned to Judge Jon S. Tigar;
- *Heck v. California Physicians' Service*, Case No. 3:25-cv-03300, previously assigned to Judge Thomas S. Hixson;
- *LaMarre v. California Physicians' Service*, Case No. 4:25-cv-03301, previously assigned to Judge Jon S. Tigar;
- *Bage v. California Physicians' Service*, Case No. 3:25-cv-03304, previously assigned to Judge James Donato;
- *Reiman v. California Physicians' Service*, Case No. 4:25-cv-03347, previously assigned to Judge Alex G. Tse;

- *Aiello v. California Physicians' Service*, Case No. 4:25-cv-03386, previously assigned to Judge James Donato;
- *Foley v. California Physicians' Service*, Case No. 4:25-cv-03394, previously assigned to Judge Trina L. Thompson;
- *Reingold v. California Physicians' Service*, Case No. 4:25-cv-3442, previously assigned to Judge William H. Orrick;
- *Kahn v. California Physicians' Service*, Case No. 4:25-cv-03523, previously assigned to Judge Charles R. Breyer;
- *Smith v. Blue Shield of California Life & Health Insurance Company*, Case No. 4:25-cv-3712, previously assigned to Judge Alex G. Tse;
- *Jones et al. v. California Physicians' Service*, Case No. 4:25-cv-03743, previously assigned to Judge Laurel Beeler;
- *Doe I et al. v. California Physicians' Service*, Case No. 4:25-cv-03925, previously assigned to Judge Maxine M. Chesney;
- *Ramirez v. California Physicians' Service*, Case No. 4:25-cv-04165, previously assigned to Judge Laurel Beeler; and
- *J.T., et al. v. California Physicians' Service*, Case No. 4:25-cv-04343, previously assigned to Judge Sallie Kim.

2. All papers filed in the Consolidated Action must be filed under Case No. 4:24-cv-03209-YGR, the number assigned to the Lead Case, and must bear the following caption:

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

*In re Blue Shield of California Privacy
Litigation*

Case No. 4:25-cv-03209-YGR

This Document Relates To:

3. The case file for the Consolidated Action will be maintained under the Master File Case No. 4:25-cv-03209. When a pleading is intended to apply to all of the Related Actions, the words “All Actions” shall appear immediately after “This Document Relates To:” in the caption described above. When a pleading is not intended to apply to all actions, the docket number for each individual action to which the paper is intended to apply and the last name of the first-named plaintiff in said action shall appear immediately after the words “This Document Relates To:” in the caption described above.

4. The clerk is directed to administratively close the following related cases:

- *Maravilla v. California Physicians Service*, Case No. 3:25-cv-03213, previously assigned to Judge Peter H Kang;
- *Archie v. California Physicians’ Service*, Case No. 4:25-cv-03222, previously assigned to Judge Donna M. Ryu;
- *W. v. California Physicians’ Service*, Case No. 3:25-cv-03225, previously assigned to Judge Maxine M. Chesney;
- *Torres v. California Physicians’ Service*, Case No. 3:25-cv-03228, previously assigned to Judge Rita F. Lin;
- *Johnson v. California Physicians’ Service*, Case No. 4:25-cv-03234, previously assigned to Judge Jon S. Tigar;
- *Heck v. California Physicians’ Service*, Case No. 3:25-cv-03300, previously assigned to Judge Thomas S. Hixson;
- *LaMarre v. California Physicians’ Service*, Case No. 4:25-cv-03301, previously assigned to Judge Jon S. Tigar;
- *Bage v. California Physicians’ Service*, Case No. 3:25-cv-03304, previously assigned to Judge James Donato;
- *Reiman v. California Physicians’ Service*, Case No. 4:25-cv-03347, previously assigned to Judge Alex G. Tse;
- *Aiello v. California Physicians’ Service*, Case No. 4:25-cv-03386, previously assigned to Judge James Donato;

- *Foley v. California Physicians' Service*, Case No. 4:25-cv-03394, previously assigned to Judge Trina L. Thompson;
- *Reingold v. California Physicians' Service*, Case No. 4:25-cv-3442, previously assigned to Judge William H. Orrick;
- *Kahn v. California Physicians' Service*, Case No. 4:25-cv-03523, previously assigned to Judge Charles R. Breyer;
- *Smith v. Blue Shield of California Life & Health Insurance Company*, Case No. 4:25-cv-3712, previously assigned to Judge Alex G. Tse;
- *Jones et al. v. California Physicians' Service*, Case No. 4:25-cv-03743, previously assigned to Judge Laurel Beeler;
- *Doe I et al. v. California Physicians' Service*, Case No. 4:25-cv-03925, previously assigned to Judge Maxine M. Chesney;
- *Ramirez v. California Physicians' Service*, Case No. 4:25-cv-04165, previously assigned to Judge Laurel Beeler; and
- *J.T., et al. v. California Physicians' Service*, Case No. 4:25-cv-04343, previously assigned to Judge Sallie Kim.

5. Any subsequently filed, removed, or transferred action that alleges the same or substantially similar claims as this consolidated action shall be consolidated for all proceedings and purposes. Any party objecting to such consolidation must file a motion requesting relief from this order within fourteen (14) calendar days after the action is consolidated.

6. As soon as practicable, the parties will notify the Court pursuant to Civil Local Rule 3-12 whenever a related case that should be consolidated into this action is filed in, or transferred to, this District.

7. Any counsel who has filed an action in this Consolidated Action may file an individual or joint application for consideration as interim class counsel no later than twenty-one (21) calendar days from the date of entry of the Court's order approving this stipulation. Each attorney's individual or joint application shall not exceed ten (10) pages double-spaced addressing the factors set forth in Rule 23(g)

and may attach or include a link to their firm resume(s). Any counsel of record in the Consolidated Action may file a two-page double-spaced response (including attachments), no later than fourteen (14) calendar days from the filing deadline of the initial applications.

8. The parties preliminarily agree that the case will proceed on the following schedule:

- Plaintiffs will file a consolidated complaint no later than forty-five (45) calendar days following the appointment of interim class counsel;
- Defendant will respond to the consolidated complaint within forty-five (45) calendar days of its filing. If Defendant responds by way of motion(s), Plaintiffs will have forty (40) calendar days to oppose the motion(s), and Defendant will have thirty (30) calendar days to reply.

IT IS SO STIPULATED.

Dated: June 2, 2025

Respectfully submitted,

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25 **ATTESTATION OF FILER**

26 I, Adam E. Polk, am the ECF user whose ID and password are being used to file this document.
27 In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

28 Dated: June 2, 2025


/s/ Adam E. Polk

Adam E. Polk

~~PROPOSED~~ ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: June 3, 2025


Hon. Yvonne Gonzalez Rogers
United States District Judge